

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Baltimore District

IN RE:

Margot E. Roberts
aka Margot Elizabeth Roberts
Debtor(s)

Bankruptcy No. 21-11008
Chapter 13

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

Now comes Caliber Home Loans, Inc. by and through Law Offices of Jeffrey Nadel and Jeffrey Nadel, Esq. and Scott E. Nadel, Esq. and objects to the Chapter 13 Plan filed by the debtor, and as grounds therefore states as follows:

1. That the debtor herein filed a Voluntary Petition for Relief under Chapter 13 of Title 11 of the U.S. code on or about February 18, 2021, thus initiating case number 21-11008.
2. That Caliber Home Loans, Inc. is the holder of a 1st Trust lien on the subject property, 2008 Spark Court, Baltimore, MD 21231 and further known as tax ID # 02-09-1765-085 in Baltimore City, Maryland.
3. That Caliber Home Loans, Inc. filed a Proof of Claim for its lien on March 10, 2021 wherein they set forth a pre-petition claim in the amount of \$8,770.45.
4. That the debtor has filed a Plan which does not call for pre-petition payments to the Trustee for the full amount of the Proof of Claim pre-petition arrearages as set forth by Caliber Home Loans, Inc.
5. That no objection to the said proof of claim has been filed and therefore the claim is presumed to be valid and in the amount stated. 11 USC § 502(a); Bankruptcy Rule 3001(f).
6. That therefore the plan is unfeasible and cannot be confirmed as a matter of law unless amended to provide for curing of the arrearage claim of Caliber Home Loans, Inc. and to provide adequate funding for all payments, which are required to be made under the plan.

WHEREFORE, Caliber Home Loans, Inc. prays that the Chapter 13 Plan as filed by the debtor be DENIED confirmation.

LAW OFFICES OF JEFFREY NADEL

By: /s/ Jeffrey Nadel
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By: /s/ Scott E. Nadel
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Attorney for Caliber Home Loans, Inc.

Certificate of Service

I hereby certify this 11th day of March, 2021 that a copy of the foregoing Objection was mailed, postage prepaid, first class, to the following:

Margot E. Roberts
2805 Highway 17
Williamston, NC 27892

Office of U.S. Trustee
101 W. Lombard Street
Room 2650
Baltimore, MD 21201

The following parties have been served via ECF:

Patrick J. Best, Esquire
18 North 8th Street
Stroudsburg, PA 18360

Rebecca A. Herr, Trustee
185 Admiral Cochrane Dr., Suite 240
Annapolis, MD 21401

/s/ Scott E. Nadel
Scott Nadel